IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

DEFENDANT LISA WISE'S RULE 26(a)(3) PRETRIAL DISCLOSURES

Defendant El Paso County Elections Administrator, Lisa Wise, pursuant to the Second Amended Scheduling Order entered on March 30, 2023 (ECF No. 579), and Rule 26(a)(3) of the Federal Rules of Civil Procedure, makes her pretrial disclosures. Defendant Wise reserves the right to amend her disclosures to include witnesses or exhibits that she could not have reasonably anticipated to be necessary, or to respond to amendments to the other parties' disclosures made under Rule 26(a)(3)(A)(i)-(iii).

A. WITNESSES (Rule 26(a)(3)(A)(i))

Witnesses Defendant Wise expects to present:

None

Witnesses Defendant Wise will call if the need arises:

None.

The following witnesses will testify, if necessary, regarding attorneys' fees and costs:

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B. DESIGNATIONS OF DEPOSITION TESTIMONY (Rule 26(a)(3)(A)(ii))

None. However, Defendant Wise reserves the right to offer portions of the deposition of any witness that the opposing parties may designate pursuant to Rule 26(a)(3)(A)(ii). *See* Fed. R. Civ. P. 32(a)(6).

C. DOCUMENTS AND OTHER EXHIBITS (Rule 26(a)(3)(A)(iii))

Documents and other exhibits Defendant Wise expects to offer:

None.

Documents and other exhibits Defendant Wise will offer if the need arises:

None

Dated: July 28, 2023

/s/ Kathleen Hartnett Kathleen Hartnett* (CA SBN 314267)

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Attorneys for Defendant Lisa Wise, in her official capacity as the El Paso County Elections Administrator

CERTIFICATE OF SERVICE

I certify that on July 28, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of this filing to counsel of record.

/s/ Kathleen Hartnett Kathleen Hartnett